

**DAVID K. BERTAN**  
ATTORNEY AT LAW  
41 EAST 11<sup>TH</sup> STREET, 11<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10003

(718) 742-1688  
E-MAIL: DBERTAN@YAHOO.COM

December 17, 2022

**Via EFC**

Hon. Paul G. Gardephe, United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: USA v. Pierre (Andrew Prime)  
22-Cr-19 (PGG)

Dear Judge Gardephe:

I represent Mr. Andrew Prime in the above matter. As this Court is aware, Mr. Prime has business interests in Los Angeles, California; with the Court's permission, Mr. Prime has made several trips to California to attend to business matters. He has several anticipated trips coming up in the next few weeks. Accordingly, I am requesting that his bail conditions be modified to permit him to travel to California for work without seeking a temporary bail modification for each trip, provided he gives both Pre-Trial and the Government advance notice at least one week before traveling. Both Pre-Trial and the Government have no objection to this modification.

Very truly yours,

  
David K. Bertan


DKB

cc: AUSAs Mathew Andrews and Louis Pellegrino (via ECF)

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
**Paul G. Gardephe, U.S.D.J.**  
Dated: December 20, 2022